

Mr. John Searcy
Engineering Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, TN 37219

Dear Mr. Searcy:

Your letter of September 23, 1974, asked two questions concerning Part 192 Section 192.197, Control of the pressure of gas delivered from high-pressure distribution systems. In response to these we offer the following:

(1) Question: Where an industrial customer requires and receives a minimum of 10 psi, reduces this with his own regulators within his plant to 5 psi at each piece of utilization equipment, is 10 psi or 5 psi considered the safe gas utilization equipment pressure as referred to in 192.197(b)?

Answer: The safe utilization pressure in such a case would be 10 psi and the individual regulators provided by the consumer would be considered similar to appliance regulators that are often used on domestic appliances.

(2) Question: If a maximum allowable operating pressure is 50 psi and a service regulator that does not have all of the characteristics listed in 192.197(a) is used to provide the 10 psi described above, is it a correct interpretation that, in accordance with 192.197(b), suitable protective devices must be installed?

Answer: The condition described would fall within the requirements of 192.197(b) and thus an additional suitable protective device would be required for the gas operator to comply with this section.

Thank you for your interest in pipeline safety.

Sincerely

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

Mr. Joseph C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
2100 Second Street, SW
Washington, D. C. 20590

Dear Mr. Caldwell:

Where an industrial customer requires and receives a minimum of 10 psi, reduces this with his own regulators within his plant to 5 psi at each piece of utilization equipment, is 10 psi or 5 psi considered the safe gas utilization equipment pressure as referred to on 192.197(b)?

If a maximum allowable operating pressure is 50 psi and a service regulator that does not have all of the characteristics listed in 192.197(a) is used to provide the 10 psi described above, is it a correct interpretation that, in accordance with 192.197(b), suitable protective devices must be installed?

Sincerely,

John Searcy
Engineering Division